U.S. Department
of Transportation

Research and
Special Programs
Administration

Southwest Region,
Pipeline Safety

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NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 30, 1997

Mr. Richard D. Hatchett
Vice-President, Operations
West Texas Gas, Incorporated
211 Colorado
Midland, Texas 79701-4696

CPF No. 47106-M

Dear Mr. Hatchett:

On May 20, through May 22, 1997, engineers from the Southwest Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of the operating and maintenance (O&M) procedures manuals and the pipeline records for West Texas Gas, Incorporated (WTG) at your facilities in Dalhart, Texas. The inspection uncovered several items which need to be included in your procedures manual.

§192.605(a). Procedural manual for operations, maintenance and emergencies. Each pipeline operator shall prepare and follow for each pipeline system a manual of written procedures for conducting operations and maintenance activities and for emergency response.

No procedures were found for the activities mandated by the following regulations:

1. §192.225 Welding - General.
(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify the procedures shall be determined by destructive testing.

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

The manual required by §192.605(a) has procedures for downhill butt welding in the fixed position but no procedures for fillet welding or procedures for retaining the welding procedures and results.

2. §192.241 Inspection and test of welds.

(a) Visual inspection of welding must be conducted to insure that:

(1) The welding is performed in accordance with the welding procedure; and

(2) The weld is acceptable under paragraph (c) of this section.

(c) The acceptability of a weld that is nondestructively tested or visually inspected is determined according to the standards in Section 6 of API Standard 1104. However, if a girth weld is unacceptable under those standards for a reason other than a crack, and if the Appendix to API Standard 1104 applies to the weld, the acceptability of the weld may be further determined under that Appendix.

The manual required by §192.605(a) has no procedures for the visual inspection of welds or criteria by which the acceptability of a weld may be determined. There is no procedure for recording the results of visual inspections of welds.

3. §192.245 Repair or removal of defects.

(a) Each weld that is unacceptable under §192.241© must be removed or repaired. Except for welds on an offshore pipeline being installed from a pipeline vessel, a weld must be removed if it has a crack that is more than 8 percent of the weld length.

(b) Each weld that is repaired must have the defect removed down to sound metal and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair. After repair, the segment of the weld that was repaired must be inspected to ensure its acceptability.

(c) Repair of a crack, or of any defect in a previously repaired area must be in accordance with written weld repair procedures that have been qualified under §192.225. Repair procedures must provide that the minimum mechanical properties specified for the welding procedure used to make the original weld are met upon completion of the final weld repair.

The manual required by §192.605(a) has no procedures for the repair of welds that are unacceptable under §192.241(c).

4. §192.713 Transmission lines: Permanent field repair of imperfections and damages.

(a) Except as provided in paragraph (b) of this section, each imperfection or damage that impairs the serviceability of a segment of steel transmission line operating at or above 40 percent of SMYS must be repaired as follows:

(1) If it is feasible to take the segment out of service, the imperfection or

damage must be removed by cutting out a cylindrical piece of pipe and replacing it with pipe of similar or greater design strength.

(2) If it is not feasible to take the segment out of service, a full encirclement welded split sleeve of appropriate design must be applied over the imperfection or damage.

(3) If the segment is not taken out of service, the operating pressure must be reduced to a safe level during the repair operations.

The manual required by §192.605(a) has no procedures for determining when an imperfection, such as corrosion, impairs the serviceability of a pipeline segment. Without a written procedure it appears that subjective decisions are used to determine the need for a repair sleeve or patch.

5. §192.717 Transmission lines: Permanent field repair of leaks.

(a) Except as provided in paragraph (b) of this section, each permanent field repair of a leak on a transmission line must be made as follows:

(3) If the leak is due to a corrosion pit, the repair may be made by installing a properly designed bolt-on-leak clamp; or, if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi SMYS, the repair may be made by fillet welding over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size.

The manual required by §192.605(a) has no procedures for the design and fabrication of a steel plate repair patch or for the welding of the patch to the pipe.

6. §192.719 Transmission lines: Testing of repairs.

(b) Testing of repairs made by welding. Each repair made by welding in accordance with §§192.713, 192.715, and 192.717 must be examined in accordance with §192.241.

The manual required by §192.605(a) has no procedures for the visual or ultrasonic examination of repairs made by welding.

As provided in 49 C.F.R. §190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. § 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. § 190.237. If you do not wish to contest this notice, please provide your revised procedures within 45 days of receipt of this notice. (See the attachment to this notice.)

Should you have any questions regarding this notice of amendment please make reference to CPF # 47106-M.

Sincerely,

James C. Thomas
Regional Director

Attachment

Notice of Amendment

You are to amend the procedural manual required by §192.605(a) as follows:

1. Prepare and qualify written procedures for pipeline fillet welding and pipeline maintenance welding. Although 49 CFR Part 192 does not specify the use of any standard for qualification of welding procedures, you may find API Standard 1104, Welding of Pipelines and Related Facilities, Section 2 and API Standard 1107, Pipeline Maintenance Welding Practices, Section 2 helpful in developing these procedures. OPS recommends the use of low hydrogen welding rods to prevent the entrapment of hydrogen bubbles in the cooled weld metal when making fillet welds on pipelines through which gas is flowing; this is discussed in Section 4.1 of API 1107.

2. Prepare written procedures for the visual and ultrasonic inspection of welds and for the recording of these inspections. Perhaps you may wish to include the inspection record in the "Comments" section of your repair record.

3. Prepare written procedures for the repair or removal of weld defects that are unacceptable under §192.241(c).

4. Prepare written procedures for determining when imperfections, such as corrosion, impairs the serviceability of a pipeline segment.

5. Prepare written procedures for the design, fabrication and installation of steel plate repair patches.

6. Prepare written procedures for the visual or ultrasonic examination of repairs made by welding.

Upon completion of the procedures please send a copy to this office for review and approval within 45 days of the receipt of this letter.